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Berks County Environmental Advisory Council
Berks County Agricultural Center
1238 County Welfare Road
Leesport, PA 19533

April 11, 2007

U.S. Environmental Protection Agency
Attention Mr. Mitch Cron
Remedial Project Manager
Mail Code 3HS22
1650 Arch Street
Philadelphia, PA 19103-2029

Sent via fax to: (215) 814-3002

**RE: COMMENTS REGARDING THE BALLY GROUND WATER
CONTAMINATION SUPERFUND SITE (OU2)- REMEDIAL ACTION
PLAN – USEPA ID# PAD061105128**

Dear Mitch:

The Berks County Environmental Advisory Council (BCEAC) offers the following comments with the respect to the proposed Bally Ground Water Contamination Superfund Site, Bally, Berks County, PA Operable Unit Two (OU2) Remedial Action Plan presented by the USEPA at the public hearing held March 22, 2007. The site was separated in to three operable units. Operable Unit Two is the Borough of Bally public water supply. Our comments within this letter are limited to OU2.

Background:

Contaminants in groundwater surrounding the Bally Ground Water Contamination Superfund Site, which includes the Bally Water Supply System, consist of chlorinated volatile organic compounds (VOCs) including: trichloroethylene (TCE), 1,1,1-trichloroethane (1,1,1-TCA), and 1,1 dichloroethene (1,1-DCE). The site has been identified as a superfund site since the early 1980's. Although a two-stage air stripper treatment system was installed around 1989 the concern for elevated levels of 1,4-dioxane was not identified until 2003.

Several investigations and studies have been conducted as part of the USEPA's superfund program. The potentially responsible party (PRP), Bally Engineered Structures (BES), completed the Focused Feasibility Study (FFS) via its consultant Arcadis, Newtown, PA. This study was initiated in 2003 with the FFS being completed in 2007. Two remedial alternatives were presented in the FFS. The first was to install a new municipal supply well to replace the existing water supply well(s) and the second was to provide additional treatment of the existing supply well for the treatment of 1,4-dioxane.

The USEPA preferred remedial alternative is the installation of a new municipal supply well. Our comments have been focused towards this alternative and the studies conducted by Arcadis with regard to the draw down and other potential impacts in the area surrounding the new supply well. It should be noted our comments are based upon the information that was made available to us for review.

Comments:

The BCEAC agrees that the installation of a new municipal well is the best alternative since it is our understanding that current technologies do not allow for complete and consistent treatment of 1,4-dioxane. We are, however, reluctant to endorse immediate use of this well until further environmental impact assessments are conducted or clarification of the following concerns are addressed:

- After review of the *Detailed Hydrogeologic Water Resources Investigation Report* (Arcadis, March 2006) we have concerns about the discharge point of the pump test being placed between the pumping well and monitoring locations. Any recharge that may have occurred may have impacted the results that were observed in the monitoring points.
- In addition, the discharge from the pumping well appears to have been the discharged to the drainage channel located to the southeast of MW-1. This channel discharges into the stream that was being evaluated for draw down. The stream monitoring protocols and procedures are not sufficient in the text of the report to evaluate whether accurate assessment of the potential impacts to surface water were evaluated. It is difficult from the information provided to assess whether an inversion occurred since the flow was increased by the discharge from the pumping well. Typically the discharge from the pump tests is piped or conveyed downgradient (i.e., downstream) of the stream monitoring points not included within the flow being evaluated. Further details regarding the stream monitoring are required to complete our review of this effort.
- Wetland investigations conducted at the site were restricted to onsite wetlands. Areas surrounding the site may also be impacted from the use of this public water supply. All areas within the anticipated cone of depression resulting from the use of the well should have been considered during this study.
- After discussion with Ms. Alysa Suero of the Delaware River Basin Commission (DRBC), we understand that no application or documents have been supplied by the PRP for this new supply well to be considered for use. The DRBC indicated it had received a copy of the *Detailed Hydrogeologic Water Resources Investigation Report* (Arcadis, March 2006) from the USEPA; however, no review of the study has been conducted since no application has been submitted to date. We feel the DRBC should be allowed to review and comment on the hydrogeologic study prior to acceptance of this well for use. Any comments or concerns the DRBC presents should be addressed as part of the official comments, even if they are

received after the deadline date since the PRP has not submitted an application to date.

- The new supply well is located in Washington Township. We understand that Washington Township currently has no wellhead protection ordinance in place. We feel that discussion with Washington Township should be encouraged to establish a wellhead protection ordinance to restrict development and/or use of the parcels adjacent to the municipal supply well to ensure long-term protection of the resource.
- We suggest continued sampling of the monitoring well placed to assess any potential impacts from the former quarry site located north of the supply well. Even though initial results reveal no contaminants, additional sampling is warranted due to the lack of information existing regarding the types of debris and/or wastes that may have been discarded at this location.
- We encourage contingency plans to be considered in the event the existing contaminant plume migrates towards the new supply well location. Increased water use from the new supply well could draw contaminants towards the new supply well. Contingency plans should be in place to address this concern.
- Access, right-of-way, and other related civil matters should be addressed with local citizens. Discussions regarding these matters have apparently been limited to individuals that have no authority to resolve disputes or concerns. In addition, the pump test revealed adverse impacts to surrounding homeowner wells. Resolution of these anticipated impacts should be conducted prior to further consideration for the use of the well.
- We would hope that these and the other comments received can be appropriately addressed within a reasonable timeframe. Berks County is concerned with the extent of time it has taken to resolve this particular environmental issue.

We would be happy to discuss these concerns in greater detail. If you should have any questions, please feel free to contact us. We would like to be able to review and comment on any additional supporting documents that may be provided in response to our concerns.

Sincerely,

Stephen A. Wheeler
Chairman

cc: Berks County Commissioners
DRBC (Ms. Alysa Suero)



"Wheeler Environmental
Services"
<wheeleres@dejazzd.com>
03/25/2007 12:13 PM

To Mitch Cron/R3/USEPA/US@EPA
cc <Craig@walsky.com>, "Chris Ehret" <ehrets@gmail.com>
bcc

Subject BCEAC - Bally Water Supply

History:  This message has been replied to.

Mitch:

As per our discussion Thursday night at the public meeting, the BCEAC is awaiting the reports you indicated you would forward regarding the surface water monitoring and studies conducted as part of the pump test(s) for the new municipal supply well for Bally. We would also like to review the reports (groundwater monitoring, soil borings, etc.) that were conducted for the "suspect fill area" north of the proposed well. Finally, we would like to review the studies, if any, that were conducted to determine the potential yield of the aquifer that is being tapped.

You indicated USEPA's desire to meet with the property owners of the parcels that will or may be affected by the use of the new well. The anticipated meeting(s) are proposed to resolve concerns with respect to draw down, easement and/or right-of-way issues, and other impacts before this well is considered for use. Little if any time appears to have been spent on this effort. We feel this is a critical matter that warrants attention. We would like to be notified of any such meetings so that we may attend, where appropriate.

We wish to review the information requested prior to offering comment on the proposed alternative. We expect your timely response to these requests so that we may provide comment prior to the deadline of April 11, 2007. We understand that the issue of treatment of MW #3 is to be addressed at a future public meeting and will have its own comment period. If you should have any questions regarding this matter, please contact me.

Sincerely,
Stephen A. Wheeler
Chairman
Berks County Environmental Advisory Council
personal contact info:
email: wheeleres@dejazzd.com
cell # 610-334-4209